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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 LEE T. DRONE,

19 Defendant.

) No. CR 18-00008-MAG

)
) STIPULATION AND ~~PROPOSED~~ ORDER
) SETTING HEARING DATE AND EXCLUDING
) TIME FROM THE SPEEDY TRIAL ACT
) CALCULATION
)
)
)
)

20 The parties, through Counsel, stipulate that the status/change of plea hearing currently scheduled
21 for December 3, 2018, may be continued to February 4, 2019. The reason for the requested continuance
22 is to allow the parties sufficient time to conduct additional investigation, and reach a resolution in this
23 case. The parties also jointly request that time be excluded under the Speedy Trial Act between August
24 6, 2018 and February 4, 2019 to allow the defense and the Government continuity of counsel and the
25 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

26 See 18 U.S.C. § 3161(h)(7)(B)(iv).

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STIPULATION AND ~~PROPOSED~~ ORDER
CR 18-00008-MAG

1 //
2 Dated: 02/04/2019

/s/
TAMARA CREPET
Counsel for Defendant

4 Dated: 02/04/2019

/s/
SCOTT N. SPANSAIL
Special Assistant United States Attorney

8 ~~[PROPOSED]~~ ORDER


9 Upon stipulation of the parties, IT IS ORDERED that:

- 10 1. This matter is set before this Court for a change of plea hearing on February 4, 2019.
11 2. The time between August 2, 2018 and February 4, 2019 shall be excluded from the
12 computation of time within which trial shall commence under the Speedy Trial Act, as failure to grant
13 the requested continuance would deny defense and Government counsel the reasonable time necessary
14 for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C.
15 § 3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance outweigh the best
16 interest of the public and the defendant in a speedy trial. *See id.* § 3161(h)(7)(A).

17 IT IS SO ORDERED.

18
19 Dated: ~~02/04/2019~~

20 January 21, 2019


VIRGINIA DEMARCHI
United States Magistrate Judge